

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**Philip Wilkinson and Pam Reed,
individually and on behalf of a class or
classes of all others similarly situated,**

Plaintiffs,

v.

**BDO USA, LLP and BDO
International Ltd.,**

Defendants.

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Cause No. 3:11-cv-01115-N

JOINT STIPULATION AND AGREED MOTION REGARDING SCHEDULING

Plaintiffs Philip Wilkinson and Pam Reed, individually and on behalf of classes of all others similarly situated, (hereinafter "Plaintiffs") and Defendant BDO USA, LLP (hereinafter "BDO" and, collectively with Plaintiffs, the "Parties"), file this Joint Stipulation and Agreed Motion Regarding Scheduling. In support hereof, the Parties would respectfully show the Court as follows:

1. Plaintiffs filed their Original Class Action Complaint (the "Complaint") on May 26, 2011. BDO was subsequently served with a summons and a copy of the Complaint on June 21, 2011. Pursuant to Rule 12 of the Federal Rules of Civil Procedure, BDO's deadline to answer or otherwise defend in this action is July 12, 2011.

2. The Parties hereby stipulate and agree that the time within which BDO must answer, move, or otherwise plead in response to the Complaint is extended until and including August 12, 2011.

3. The Parties further stipulate and agree that in the event BDO files a motion directed at the Complaint, Plaintiffs shall have until and including October 3, 2011 to file and serve a response.

4. The Parties further stipulate and agree that BDO shall have until and including November 2, 2011 to file and serve its reply to Plaintiffs' response.

5. The entry of this stipulation shall not be deemed a waiver of any defenses, including but not limited to lack of jurisdiction, improper venue, and/or defective service of process. Furthermore, consent to this stipulation shall not be deemed a purposeful availment or submission to this court's jurisdiction.

The Parties thus respectfully request that the Court grant their Joint Stipulation and Agreed Motion Regarding Scheduling.

Dated: July 8, 2011.

Respectfully submitted,

DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, TX 75201-4629
(214) 743-4500 Main
(214) 743-4545 Facsimile

/s/ James R. Nelson
James R. Nelson
State Bar No. TX-14899800
jr.nelson@dlapiper.com

Xenia Nicole Figueroa
State Bar No. TX-24069716
nicole.figueroa@dlapiper.com

**ATTORNEYS FOR DEFENDANT
BDO USA, LLP**

HOHMANN, TAUBE & SUMMERS, L.L.P.

100 Congress Avenue, 18th Floor

Austin, Texas 78701

Telephone: (512) 472-5997

Telecopier: (512) 472-5248

/s/ Christopher W. Ahart

Guy M. Hohmann

State Bar No. TX- 09813100

guyh@hts-law.com

T. Wade Jefferies

State Bar No. TX- 00790962

wadej@hts-law.com

Christopher W. Ahart

State Bar No. TX- 24036115

chrisa@hts-law.com

ATTORNEYS FOR PLAINTIFFS